

February 6, 2002

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
Commonwealth of Massachusetts  
One South Station  
Boston, MA 02110

Re: D.T.E. 98-57, Phase IV

Dear Ms. Cottrell:

Verizon New England Inc., d/b/a/ Verizon Massachusetts ("Verizon"), Sprint Communications Company L.P. ("Sprint"), and Covad Communications Company ("Covad") (collectively "Joint Petitioners") respectfully submit these reply comments in response to WorldCom's partial opposition to the Joint Petition for Approval of Settlement Agreement ("Joint Petition") filed on December 21, 2001. The Department should grant the Joint Petition and approve Verizon's revised collocation tariff, M.D.T.E. No. 17, as filed.

On December 19, 2001, the Pennsylvania Public Utility Commission approved a similar settlement and tariff (Order attached), and similar proposals are under consideration in other jurisdictions. It is administratively easier for Verizon to file, and CLECs to follow, uniform, consistent tariffs in multiple states.

The attestation requirements should not be stricken from the proposed tariff. The Section 2.3.5.F attestation requirements of the proposed tariff provide Verizon with current confirmation by June 30 of each year from an authorized officer of the company that the CLEC is not exceeding the total load power as ordered on the collocation application. In these challenging times, the number of CLECs requiring collocation power from Verizon, and their power needs, can change very rapidly. Having current and reliable information is critical. Similarly, Section 2.3.5.E.3.g of the draft tariff provides current information on CLEC power requirements at each of its remaining collocation arrangements.

WorldCom's suggested modification of Section 2.3.5.E.6 of the proposed tariff is unnecessary. Verizon assesses penalties for over usage of DC Power under the proposed tariff based upon the information available to it (*i.e.*, whether Verizon is at fault). It is possible that the cause is not readily available or obvious whether a CLEC is at fault, or if there is another cause that is beyond Verizon's control. CLECs may dispute penalties through the dispute resolution procedures in their interconnection contract with Verizon, or through the Department's expedited dispute resolution process (220 C.M.R. §§ 15.00, *et. seq.*) if they believe that they have been unjustly penalized.

Respectfully submitted,

/s/Keefe B. Clemons

Verizon Massachusetts

/s/Antony Petrilla/K.B.C.

Covad Communications

/s/Craig D. Dingwall/K.B.C.

Sprint Communications Company L.P.